

EXHIBIT C

Volume III
Pages 1-64

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 03-12551-NG

FRANK SACO,	:
Plaintiff,	:
	:
vs.	:
	:
TUG TUCANA and	:
TUG TUCANA CORPORATION,	:
Defendants.	:

CONTINUED DEPOSITION of FRANK SACO, taken on behalf of the Defendants, pursuant to the applicable provisions of the Massachusetts Rules of Civil Procedure, before Barbara M. Montijo, a Registered Professional Reporter and Notary Public within and for the Commonwealth of Massachusetts, at the offices of Clinton & Muyzka, P.C., One Washington Mall, Boston, Massachusetts, on October 30, 2006, commencing at 2:00 p.m.

DUNN & GOUDREAU
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ORIGINAL

1 marked as Exhibit Number 8. Can you take a look
2 at that for me, please?

3 A. (Witness perusing document) I don't understand
4 the two copies of cancelled checks and bill
5 attached. I don't know what you're talking
6 about there. Wasn't the two -- what's this
7 from, my bills?

8 MR. KENNEALLY: Let's go off the
9 record.

10 (OFF THE RECORD)

11 Q. So, do you recognize this document, Mr. Saco?

12 A. Yes.

13 Q. Now, in Exhibit Number 8 on point number 9, can
14 you read that for me at the bottom?

15 A. (Witness perusing document) I was attending
16 physical therapy and medical appointments. I
17 was spending approximately \$25 a week in gas and
18 insurance for my vehicle.

19 Q. When you say you were spending \$25 for gas and
20 insurance for physical therapy appointments,
21 where were you going for physical therapy?

22 A. At that time I was going in Beverly. At the
23 Beverly Hospital Rehab, I believe. I went there
24 three separate times. Three separate sets,

1 actually, after the surgeries.

2 Q. So, after each surgery that you had, you had to
3 go for physical therapy?

4 A. Correct.

5 Q. How long did you go for physical therapy each
6 time?

7 A. I had -- we have all the dates of my
8 appointments. Six weeks. Two, three times a
9 week, something like that. It was like
10 approximately -- I seem to think that it was
11 more than 18 to 20. I thought it was more like
12 30 visits each time, but I could be wrong.

13 Q. That's your best estimate?

14 A. Yeah. I have the appointments that were all
15 scheduled and I kept all the appointments. So,
16 it's all there in the book.

17 Q. From your home to the physical therapy location,
18 how far that?

19 A. Approximately 10 miles.

20 Q. So, it's 20 miles round-trip?

21 A. Correct.

22 Q. How often would you go there per week?

23 A. I think it was mostly three. I'm a little
24 confused because I was going two the last time

1 and I can't -- I'm not sure if I was going three
2 then, three one week, two another week.

3 Q. But it's your understanding that these visits
4 to your physical therapy are all detailed in
5 your medical records; is that right?

6 A. Yes, they are.

7 Q. And your counsel has all those records?

8 A. We have all that, yeah.

9 Q. Can you explain to me how the approximate sum of
10 \$25 was calculated?

11 A. I can't explain that to you now. At the time,
12 the way I did it, the way I figured it -- I
13 don't even know how the insurance of my vehicle
14 got in there. Did I figure in what my cost of
15 my insurance was during that period? I don't
16 know.

17 Q. You don't know about that?

18 A. I'm not sure back then how it was done. I can't
19 remember.

20 Q. Now, who do you have your insurance with?

21 A. My agent's Tim Curry. I went through Plymouth
22 Rock. I get bills from Plymouth Rock. I think
23 it's Eastern Insurance.

24 Q. How much is your premium for car insurance each